

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

IN RE:
JUAN ALBERTO ESCRIBANO
***and* MIGDALIA ESCRIBANO**

**CASE NO. 6:19-bk-05880-KJ
CHAPTER 7**

Debtor.

MOTION TO TEMPORARILY VACATE DISCHARGE ORDER

COMES NOW, **LoanCare, LLC** by and through the undersigned counsel, and hereby moves to temporarily vacate the Discharge Order [**DE# 16**] entered on December 18, 2019, and in support states as follows:

1. On September 18, 2019, the Debtor filed for relief under Chapter 7 of the United States Bankruptcy Code.
2. On December 18, 2019, this Court entered a Discharge Order. [DE#14]
3. On December 26, 2019, Creditor filed a Reaffirmation Agreement between the Debtor and Creditor for property address 503 Pine Top Place, Kissimmee, Florida 34758. [DE#16].
4. Creditor moves to temporarily vacate the Discharge order to receive approval of the Reaffirmation and requests the Clerk to reissue the Discharge upon entry of order approving the reaffirmation agreement.

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WHEREFORE, **Creditor** respectfully prays that the Court:

- A. Enter an Order temporarily vacating the Discharge Order to receive approval of the Reaffirmation Agreement;
- B. Reissue the Discharge Order after Reaffirmation Approval is entered;
- C. Grant any other further relief that this Court deems just and appropriate.

Respectfully submitted,

/s/ Jeffrey S. Fraser, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of December, 2019, I served a copy of the foregoing upon:

SERVICE LIST

Juan Alberto Escribano
503 Pine Top Place
Kissimmee, FL 34758

Migdalia Escribano
503 Pine Top Place
Kissimmee, FL 34758

Walter F Benenati
Walter F Benenati, Credit Attorney PA
2702 E Robinson Street
Orlando, FL 32803

Trustee
Arvind Mahendru
5703 Red Bug Lake Road
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Winter Springs, FL 32708

U.S. Trustee
United States Trustee - ORL7/13
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801

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